

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SAINT THOMAS ENTITIES' CERTIFICATE OF GOOD FAITH

In accordance with T.C.A. § 29-26-122, counsel for the Saint Thomas Entities¹ file this certification² that they have consulted with one (1) or more experts who have provided a signed written statement confirming upon information and belief they:

(a) Are competent under T.C.A. § 29-26-115 to express opinions in this case; and

(a) Believe, based upon the information reviewed concerning the care and treatment of Plaintiffs for the incidents at issue, that there is a good faith basis to allege fault against another consistent with the requirements of T.C.A. § 29-26-115.

None of the Saint Thomas Entities' counsel has been found to be in violation of T.C.A. § 29-26-122.

¹ Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

² This certification is intended to apply to all cases in which the Saint Thomas Entities are named as defendants.

Dated: October 31, 2014

By their attorneys,

/s/ Sarah P. Kelly

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CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 31st day of October, 2014.

/s/ Sarah Kelly
Sarah P. Kelly

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